TOTAL ENVIRONMENTAL SOLUTIONS
rewei
An SAIC company
r.e. wright environmental, inc.

September 13, 1995

Mr. William D. Steuteville
On-Scene Coordinator
Superfund Removal Branch
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107-4431

Re: Completion of PCB Removal at
Rogers Electric Site
Cheverly, Maryland
REWEI Project M95239

Dear Mr. Steuteville:

On August 3, 1995, R. E. Wright Environmental Inc. (REWEI) removed additional soil in the southern half of an area previously excavated at the referenced site. The excavation was performed in response to a positive laboratory analysis result for polychlorinated biphenyls (PCBs) in a confirmation sample after the initial excavation performed in June. That confirmation sample contained 414 parts per million (414 ppm) PCB.

The excavation activities performed on August 3, 1995 resulted in the deepening of the previously excavated area by approximately 18 inches. The excavated material was placed in a roll-off container and covered with a waterproof tarp pending confirmation sample analysis.

After the excavation was complete, three soil samples were collected from the affected area and composited for analysis. The sample was analyzed for PCBs by EPA Method 8080. The results of that analysis indicated no PCBs in concentrations greater than the laboratory quantification level of 0.11 ppm. The locations of the sample points are shown on the attached Figure 1. Copies of the laboratory analysis results are also attached.

On August 28, 1995, Clean Harbors Environmental Services, Inc. (CHI) transported the roll-off to Chemical Waste Management's (CWM) Model City, New York, Hazardous Waste Landfill for disposal. The final load consisted of 12.14 tons, and was hauled under Hazardous Waste Manifest No. NY B 498300 3.

The result of this most recent excavation, confirmation sample analysis, and removal and disposal activity indicates that Blake has satisfied its obligations under Consent Administrative Order No. III-91-58-DC and the Notice of Potential Liability dated March 9, 1995 with regard to PCB remediation at the Rogers Electric Site.

The final phase of the Rogers Electric remediation was conducted between April and August, 1995. The work was initiated by EPA's detection of residual PCB contamination in the extreme northwest corner of the site in October 1994. REWEI then collected and analyzed sixteen soil samples surrounding EPA's sample point location. The analyses of these samples that PCB contamination was present on-site in excess of generally accepted cleanup levels. REWEI's sampling effort indicated that PCBs existed in concentrations greater than 10 ppm in an irregularly shaped area measuring approximately 35 x 15 feet, around EPA's initial sampling point.

Based on the sampling and analysis as described above, REWEI made an initial excavation to remove the identified contaminated area. On June 26, 1995, CHI hauled 21.15 tons of PCB-contaminated soil to CWM's landfill in Model City, New York for disposal. The material was hauled under Hazardous Waste Manifest No. NY B 498297 6.

After the first load of contaminated soil was disposed of, REWEI responded to EPA's request for additional sampling outside the Rogers Electric north and west fences. In total, fifteen samples were collected. The results of that sampling and analyses effort indicated concentrations of PCBs lower than the 10 ppm in 13 of the 15 samples. Two samples outside the north fence contained concentrations of PCB slightly above the action level, at 10.7 and 12.8 ppm, respectively. The level of PCBs detected in both samples is very close to levels acceptable at unrestricted sites and well below the unrestricted industrial land use action level of 25 ppm. Therefore, REWEI petitioned EPA to permit Blake to leave the affected soils in place. The petition was granted by a letter dated August 15, 1995.

I trust this information will be satisfactory for your needs. Should you have any questions or need additional information, don't hesitate to call me at (410) 876-0280.

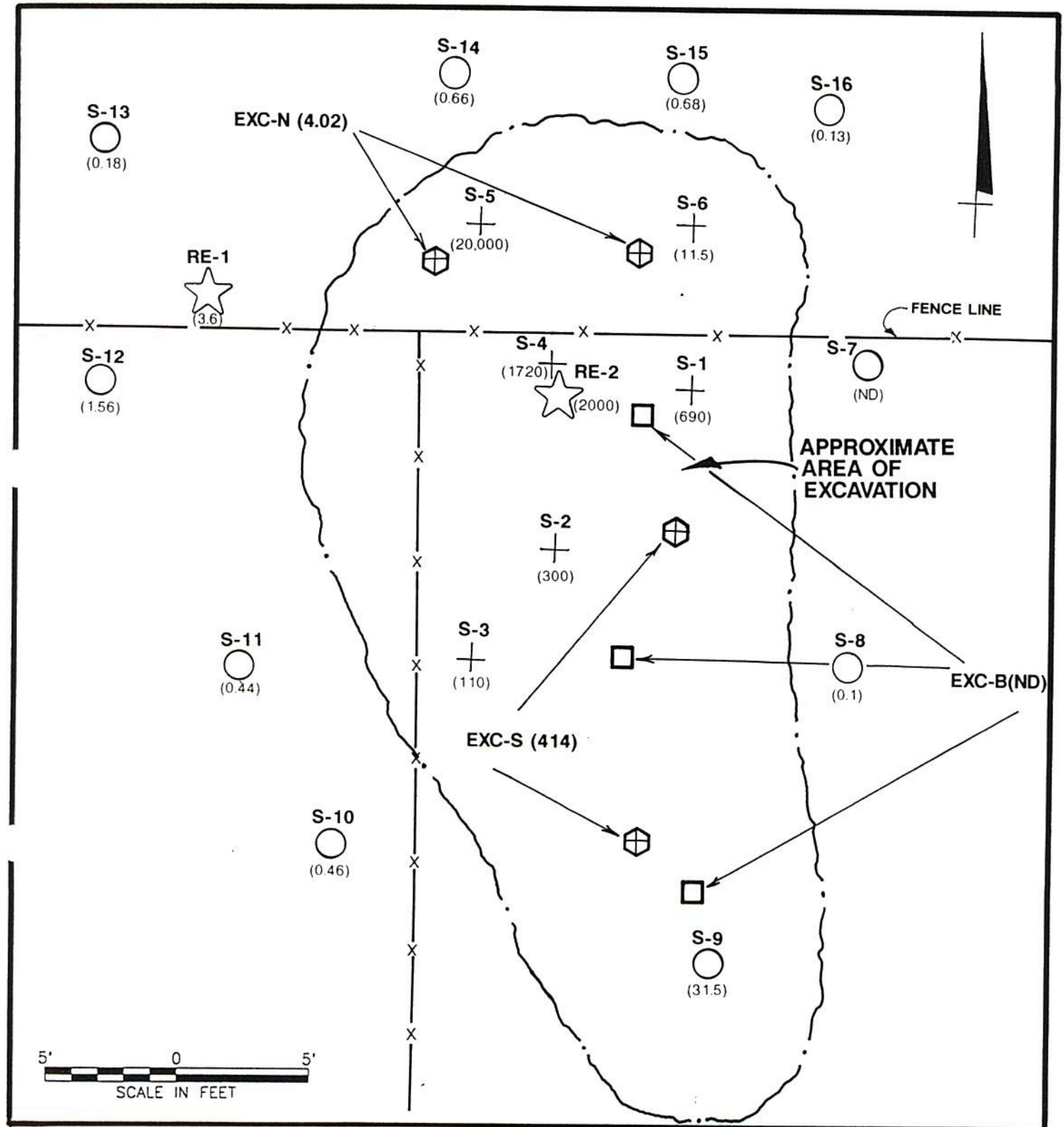
Sincerely,

R. E. WRIGHT ENVIRONMENTAL, INC.

Timothy N. Gardner
Project Manager

TNG:aea
cc: Chester White
John Seymour
M1995\5239L5

170902



LEGEND

EPA COLLECTED SAMPLE (OCT. 1994)

FIRST ROUND REWEI SAMPLES (APRIL. 1995)

SECOND ROUND REWEI SAMPLES (MAY. 1995)

CONFIRMATION COMPOSIT SAMPLE (JUNE 1995)

CONFIRMATION COMPOSIT SAMPLE (AUG 1995)

(31.5) CONCENTRATIONS OF PCB'S IN PPM

FIGURE 1

BLAKE CONSTRUCTION COMPANY, INC.

ROGERS ELECTRIC SAMPLE LOCATION MAP

drawn DCD	approved	drawing no.
checked	date 6/2/95	95239-002-A

r.e. wright environmental, inc.
total environmental solutions
middletown, pa wayne, pa westminster, md norfolk, va

SAMPLE DATA SUMMARY PACKAGE

Table of Contents

1. Narrative

NARRATIVE

Laboratory Name: Maryland Spectral Services, Inc. (MSS)

Date Sample Delivered to MSS Laboratory: 3 August 1995

Project: Rogers Electric; #95239

Project Manager: Mr. Tim Gardner

Results for the following sample are included in this data package:

Client ID	MSS ID	Matrix	Analysis
EXC-B	950803-09	Soil	PCBs (8080)

The Polychlorinated Biphenyls (PCBs) analyses were performed by U.S. EPA Methods 3540/8080 (Soxhlet/GC/ECD). Fifteen grams of each sample was extracted in a Soxhlet apparatus. The extracts were taken to a final volume of 10 mL and analyzed by GC/ECD using capillary chromatography.

Results of analysis are presented in Section 3 and are reported as milligrams per kilogram (parts per million) on a dry-weight basis.

All sample preparations and analyses were completed within the required holding time limitations.

Each sample, standard, and blank was spiked with the surrogate compound dibutyl chlorendate (DBC) to monitor method performance. Results of surrogate recoveries are presented in Section 3.

Chromatograms of samples and method blank analyses are provided in Section 4.

RELEASE OF THE DATA CONTAINED IN THIS HARDCOPY DATA PACKAGE HAS BEEN AUTHORIZED BY THE LABORATORY MANAGER OR HIS DESIGNEE, AS VERIFIED BY THE FOLLOWING SIGNATURE:

Michael M. Robison

Michael M. Robison

DATE: 9 Aug 95

9 August 1995

2. Chain-of-Custody Records

PHONE ORDER TAKEN BY: _____

DATE ORDERED: 8/3/95

~~Wright Lab Services, Inc.~~

CHAIN OF CUSTODY RECORD

DATE REQUESTED: / /

REPORT TO: RE WRIGHT ENV.	CONTACT TIM GARDNER	PHONE NO. 410 876 0280	SALESMAN
	PROJECT NAME ROGERS ELECTRIC	PROJECT NO. 95239	P.O. NO.
	DATE SAMPLED 8/3/95	SAMPLER(S) TNG	
BILL TO: RE WRIGHT ENV			

	SAMPLE DESCRIPTION/LOCATION	TIME OF SAMPLING	TOTAL NO. OF CONTAINERS	PCBs - 8080															REMARKS
1	EXC-B	AM	1	✓													MSS-1		QF-0803-09
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			

REMARKS:

SHIPPING CARRIER:

SHIPPING TICKET NUMBER:

CHAIN-OF-CUSTODY SEAL: INTACT BROKEN ABSENT

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	DATE	TIME	RELINQUISHED BY:	DATE	TIME
Tim Gardner	8/3/95	1330	L.V. Hill & Jr.	8/3/95	1330			
RECEIVED BY:	DATE	TIME	RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	DATE	TIME
RELINQUISHED BY:	DATE	TIME	RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	DATE	TIME

3. Results of Analyses

MARYLAND SPECTRAL SERVICES, INC.
1500 Caton Center Drive Baltimore, MD 21227

PCBs BY EPA METHOD 8080 (MODIFIED)

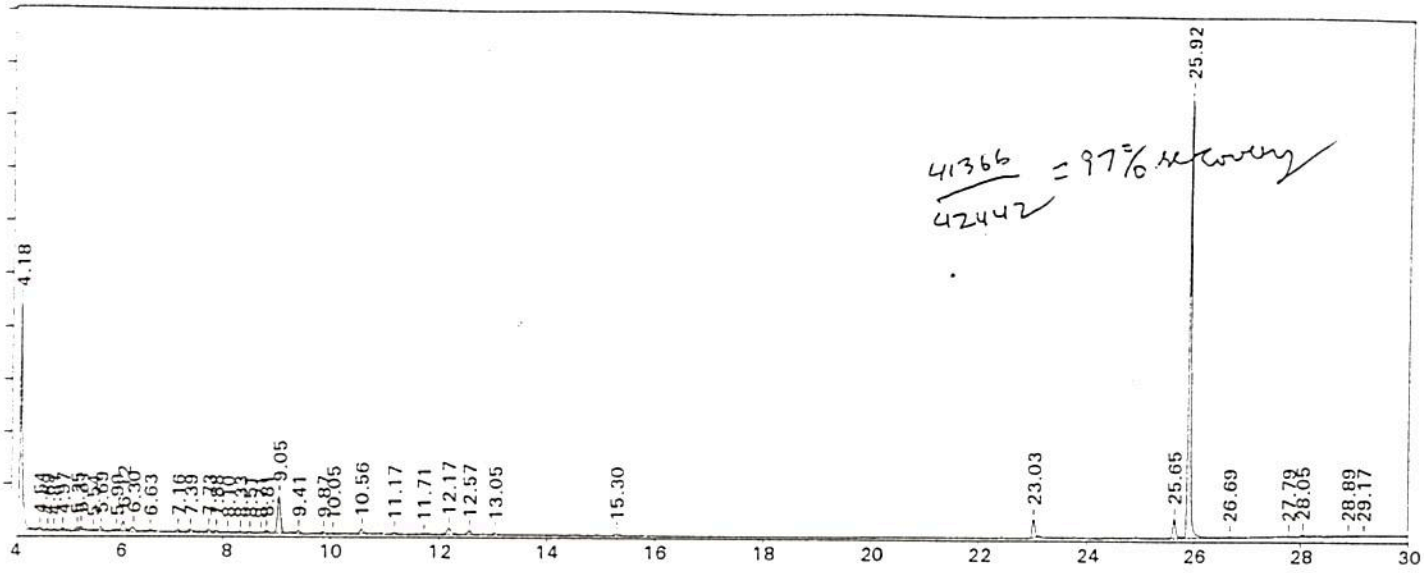
CLIENT SAMPLE ID:	ROGERS ELEC.	METHOD BLANK
LAB SAMPLE ID:	95080309	PS-BLK03
SAMPLE DATE:	08/03/95	
RECEIVED DATE:	08/03/95	
EXTRACTION DATE:	08/03/95	08/03/95
ANALYSIS DATE:	08/07/95	08/07/95
MATRIX:	SOIL	SOIL
PERCENT MOISTURE:	9 %	
UNITS:	MG/KG	MG/KG
DILUTION FACTOR:	1	1

COMPOUND (Results are reported on a dry-weight basis.)		
Aroclor-1016	0.11 U	0.10 U
Aroclor-1221	0.11 U	0.10 U
Aroclor-1232	0.11 U	0.10 U
Aroclor-1242	0.11 U	0.10 U
Aroclor-1248	0.11 U	0.10 U
Aroclor-1254	0.11 U	0.10 U
Aroclor-1260	0.11 U	0.10 U
Surrogate Recovery		
DBC	88 %	97 %

U - Below Reported Quantitation Level
MG/KG - Milligram per Kilogram

4. Chromatograms of Samples and Method Blanks

File=C:\DIRECT\DATAA1\0807A.08R Date printed=08-07-1995 Time= 14:19:29
Sample Name=PS-BLK03
4.0 to 30.0 min. Low Y=125.477 High Y=174.192 mv Span=48.715



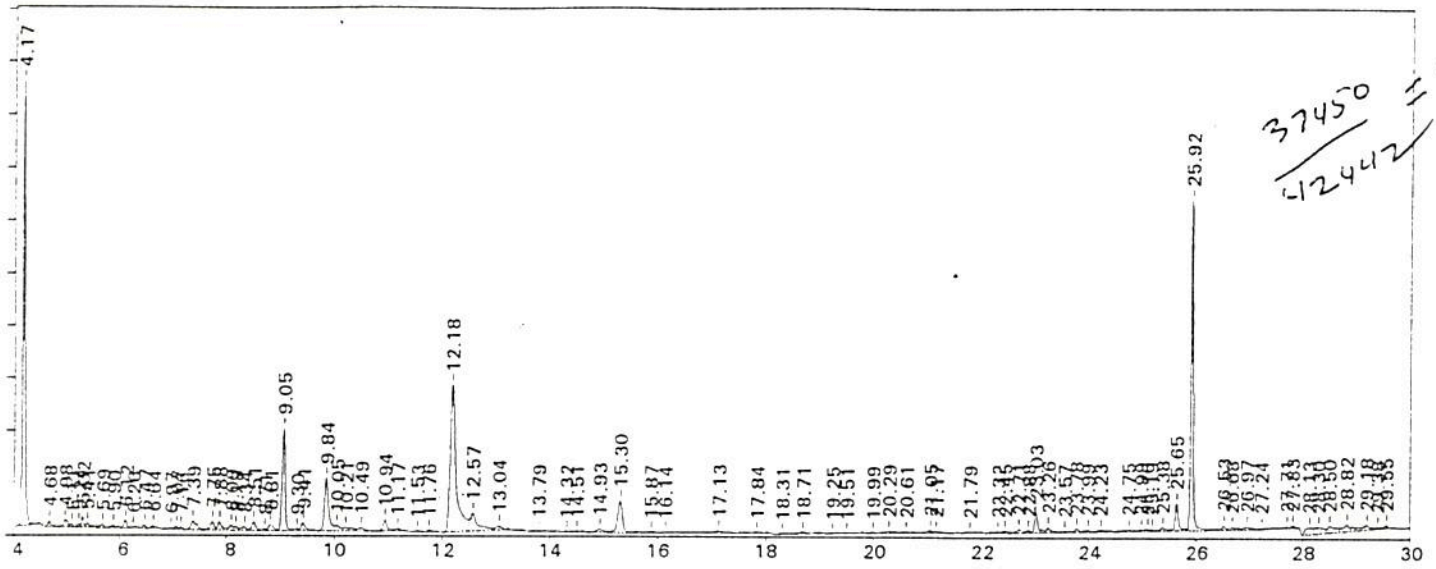
********** MARYLAND SPECTRAL SERVICES, INC. **********

* SAMPLE NAME: PS-BLK03
* ANALYSIS DATE: Aug 7, 1995 14:19:26
* OPERATOR: KD
* INSTRUMENT ID: GC-A--ECD
* METHOD FILE: C:\DIRECT\DATAA1\RUN.MET
* RAW DATA FILE NAME: C:\DIRECT\DATAA1\0807A.08R
* RUN TIME: 30
*
* DILUTION FACTOR: 1 RTX-5 30M X .32mm 2.0 uL INJ
* AMOUNT INJECTED: 1 PCBs BY 8080 MODIFIED

********* PEAKS DETECTED IN THIS CHROMATOGRAM **********

Peak #	Ret Time (min)	Compound Name	Peak Type	Peak Area	Peak Height
1	1.192		BV	1105269	129937
2	1.356		VV	657130	94116
3	1.501		VV	247647	53193
4	1.592		VV	620374	64769
5	2.110		VV	315682	57221
6	2.581		VV	12063	2372
7	2.686		VV	5985	1509
8	2.733		VV	12246	2413
9	2.895		VV	4086	1275
10	3.006		VB	4085	730
11	3.226		BB	664	341
12	3.397		BB	5801	1578
13	3.710		BV	3261	690
14	3.903		VB	703	226
15	4.176		BV	60816	21014
16	4.540		VB	993	228
17	4.686		BV	416	108
18	4.810		VV	436	105
19	4.973		VB	1478	270
20	5.248		BV	1172	335
21	5.315		VB	1064	380
22	5.544		BV	434	82
23	5.691		VB	1789	419
24	5.990		BV	1116	169
25	6.119		VV	4294	923
26	6.302		VB	2290	422

File=C:\DIRECT\DATAA1\0807A.10R Date printed=08-07-1995 Time= 15:28:30
Sample Name=950803-09
4.0 to 30.0 min. Low Y=125.371 High Y=185.717 mv Span=60.346



37450 / 12442 = 88%

********** MARYLAND SPECTRAL SERVICES, INC. **********

* SAMPLE NAME: 950803-09
* ANALYSIS DATE: Aug 7, 1995 15:28:28
* OPERATOR: KD
* INSTRUMENT ID: GC-A--ECD
* METHOD FILE: C:\DIRECT\DATAA1\RUN.MET
* RAW DATA FILE NAME: C:\DIRECT\DATAA1\0807A.10R
* RUN TIME: 30
*
* DILUTION FACTOR: 1 RTX-5 30M X .32mm 2.0 uL INJ
* AMOUNT INJECTED: 1 PCBs BY 8080 MODIFIED

********* PEAKS DETECTED IN THIS CHROMATOGRAM **********

Peak #	Ret Time (min)	Compound Name	Peak Type	Peak Area	Peak Height
1	1.197		BV	642264	74364
2	1.358		VV	491797	76473
3	1.504		VV	279274	53066
4	1.592		VV	629708	79200
5	1.905		VV	30349	7208
6	1.998		VV	38802	5100
7	2.155		VV	36352	4652
8	2.413		VV	19206	1932
9	2.583		VV	28002	5729
10	2.728		VV	52321	10650
11	2.892		VV	5799	1452
12	3.032		VV	9770	1314
13	3.224		VV	6982	1751
14	3.315		VV	4932	1041
15	3.397		VV	14033	2251
16	3.703		VV	6412	1503
17	3.759		VV	5527	1929
18	3.829		VB	7411	1857
19	4.174		BB	147985	50547
20	4.684		BV	2418	656
21	4.978		VV	4943	823
22	5.107		VV	1550	393
23	5.243		VV	1333	393
24	5.316		VV	3626	1243
25	5.407		VV	2402	511
26	5.693		VB	2027	451